

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MAURICE D. LEE, JR.

FILED**6/13/2025****UNDER SEAL**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about May 17, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Title 18 United States Code, Section 2113(a)

Offense Description

by intimidation, took from the person and presence of a bank employee approximately \$12,500 in United States currency belonging to, and in the care, custody, control, management and possession of Credit Union 1, 828 Wolcott Avenue, Chicago, Illinois, the deposits of which were then insured by the National Credit Union Administration.

This criminal complaint is based upon these facts:

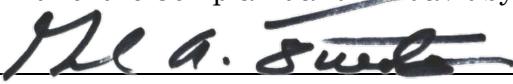
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MATTHEW STEVENSON
Special Agent, Federal Bureau of Investigation

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: June 13, 2025



Judge's signature

City and state: Chicago, Illinois

GABRIEL A. FUENTES, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, MATTHEW STEVENSON, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), where I have been employed since approximately 2020.

2. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to violent crimes, including, among others, armed robbery, kidnapping, bank robbery, and the apprehension of violent fugitives. In addition, I currently serve on FBI Chicago’s Violent Crimes and Fugitive Task Force based out of the Chicago Field Office of the FBI.

3. This affidavit is made in support of a criminal complaint alleging that MAURICE D. LEE, JR. has violated Title 18 United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging LEE, JR. with bank robbery, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, information that appears in law enforcement

records, interviews of witnesses, my review of surveillance videos and images, my training and experience, and the experience of other law enforcement agents.

I. SUMMARY OF FACTS SUPPORTING PROBABLE CAUSE

5. In summary, and as described further below, on or about May 17, 2024, at approximately 9:59 a.m., the Credit Union 1 bank located inside the University of Illinois Chicago's ("UIC") Student Center at 828 South Wolcott Avenue in Chicago, Illinois was robbed. According to bank audit records, the money taken totaled approximately \$12,500. The bank's deposits were insured by the National Credit Union Administration ("NCUA") at the time of the robbery.

6. Surveillance footage from the UIC campus captured the robber park a black 2010 Toyota Highlander bearing Illinois license plate 5552235 (the "Highlander") outside the UIC Student Center approximately thirty-seven minutes before the robbery. The robber then exited the Highlander carrying a distinctive blue backpack with accents appearing pink in color. Surveillance footage then captured the robber enter the Student Center with the backpack and walk towards Credit Union 1. Surveillance footage captured the robber enter Credit Union 1, where he pointed a black handgun at the employees and took money from the bank at gunpoint. After the robbery, surveillance footage captured the robber exit the UIC Student Center, enter the Highlander with the blue backpack, and drive away.

7. Approximately two days after the robbery, on or about May 19, 2024, LEE, JR. was arrested in Broadview, Illinois following a domestic disturbance at a motel. When officers arrived at the motel, a woman told them that she had arranged

to buy drugs from a man at the motel, but that when the man arrived at the motel room, he displayed a firearm and demanded sex from her. The woman then identified LEE JR., who was walking away from the scene, as the offender. Inside a motel room, officers recovered a black 9mm Smith & Wesson pistol, which is consistent with the firearm used by the robber during the May 17 Credit Union 1 robbery. Additionally, body-worn camera footage from the responding officers captured a blue backpack with accents appearing pink in color inside the motel room. This backpack is similar in appearance to the backpack carried by the robber during the May 17 robbery.

8. Based upon the May 19 incident at the motel, LEE, JR. was indicted of, among other offenses, aggravated unlawful use of a weapon in the Circuit Court of Cook County, Illinois and was thereafter detained in the Cook County, Illinois jail. On or about June 12, 2025, LEE, JR. pleaded guilty to one count of aggravated unlawful use of a weapon in violation of Title 720, Illinois Consolidated Statutes, Section 5/24-1.6(a)(1).

9. On or about July 10, 2024, law enforcement located and seized the Highlander used in the commission of the May 17 Credit Union 1 robbery. Law enforcement searched the Highlander and recovered, among other evidence, various DNA swabs. These swabs were submitted to the FBI Laboratory for analysis. DNA was detected on numerous swabs taken from inside the vehicle, including from the interior door handle from the front driver's side. The DNA results from these swabs indicated very strong support for LEE, JR. as one of three contributors.

II. FACTS SUPPORTING PROBABLE CAUSE

A. May 17, 2024 Credit Union 1 Robbery

10. According to surveillance footage from Credit Union 1, on or about May 17, 2024, at approximately 9:59 a.m., a male, later identified as LEE, JR., robbed Credit Union 1, which is located inside the UIC Student Center at 828 South Wolcott Avenue, Chicago, Illinois.

11. According to surveillance footage from the UIC campus, at approximately 9:22 a.m., the Highlander parked on the street at approximately 828 South Wolcott Avenue.¹ At approximately 9:57 a.m., a black male wearing a black mask, black hoodie, blue pants, black shoes, black gloves, and a blue backpack with accents appearing pink in color, exited the Highlander and made his way towards the entrance of the UIC Student Center.

12. According to surveillance footage from the UIC student center, the male entered the UIC Student Center at approximately 9:58 a.m. He then walked through the student center to the Credit Union 1 branch location, carrying the blue backpack. Below is a still image of the robber from the UIC Student Center surveillance system:

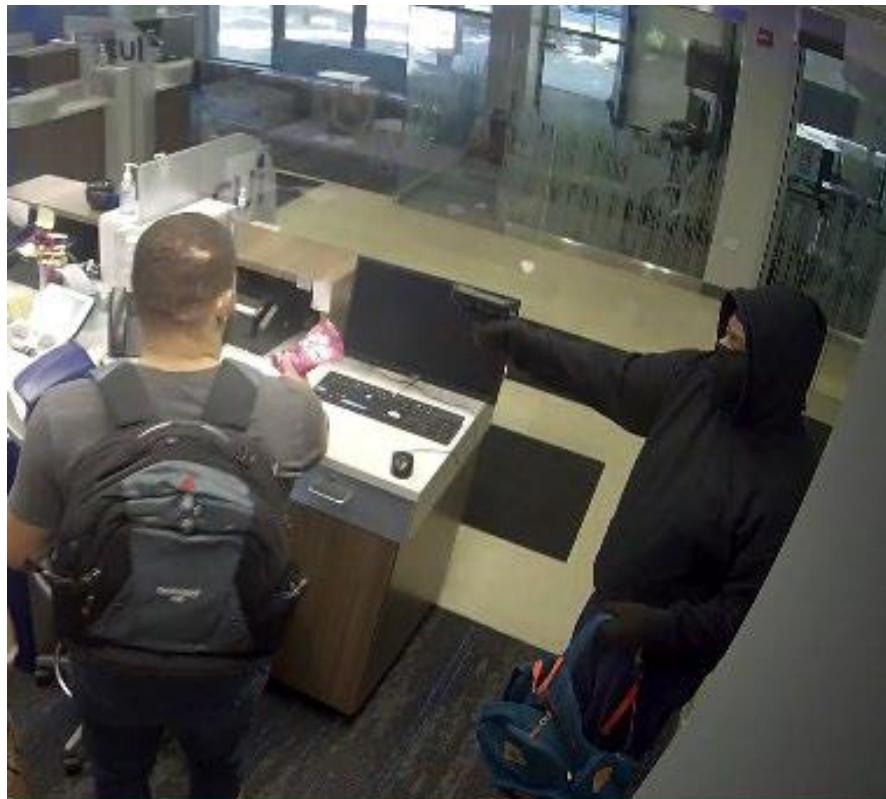
¹ According to an incident report from the Chicago Police Department (“CPD”), at approximately 1:36 a.m. on or about May 17, 2024, the Highlander was reported carjacked from 6500 block of North Western Avenue in Chicago. According to the CPD incident report, responding officers met with three witnesses at the scene—Individual A, Individual B, and Individual C. These individuals told the responding officers that Individual A, the owner of the Highlander, had just parked the Highlander when he was approached by the carjacker, who the victims described as a black male wearing a black ski mask and all black clothing, displaying a black revolver. The carjacker demanded valuables and the keys to the Highlander. After Individual A gave the keys to the Highlander to the carjacker, the carjacker entered the Highlander and drove away.



13. According to surveillance footage from Credit Union 1, the robber entered the branch at approximately 9:59 a.m. At that time, three Credit Union 1 employees—Victim Teller 1, Victim Teller 2, and Victim Teller 3—were behind the teller counter. The robber approached the teller counter, displayed a black pistol with the hammer cocked, and pointed the firearm at the employees. Victim Teller 2 and Victim Teller 3 then crouched down while Victim Teller 1 tried unsuccessfully to operate two different teller computer terminals. Victim Teller 1 and Victim Teller 2 then traded places; Victim Teller 2 operated a teller computer terminal, causing the cash machine to dispense cash. The robber collected the cash from the machine, placed the cash inside his blue backpack, and then exited the credit union carrying

his backpack at approximately 10:03 a.m. The images below are still images from Credit Union 1's surveillance system showing the robber and his firearm:







14. According to Victim Teller 1, when the robber entered Credit Union 1, he told the employees to "get down." The robber asked where the money was, and Victim Teller 1 explained that he had to log on to the computer to retrieve cash. Victim Teller 1 explained that he attempted to log on to one computer and was unable to do so, and that when he then logged onto the second computer, he was unable to locate the "hold up" button to disperse cash. Victim Teller 1 stated that Victim Teller 2 then went up to the computer and successfully hit the "hold up" button several times, dispensing approximately \$2,500 per press. According to Victim Teller 2, the robber instructed the victims not to call anyone.

15. According to Victim Teller 1, the robber was a black male, 5' 8" tall, weighing 230 to 240 pounds. According to Victim Teller 2, the robber was a black male, 5'7" or 5'8" tall with a stocky build and wearing Nike Air Force 1 shoes. According to Victim Teller 3, the robber was a black male, 5'8" tall, weighing 138 pounds.

16. According to surveillance footage from the UIC campus, the robber returned to the Highlander at approximately 10:04 a.m., at which point he entered the vehicle and drove away. The image below is a still image from the UIC campus surveillance system showing the robber walking towards the Highlander after exiting the UIC Student Center while carrying his backpack:



17. According to an audit conducted by Credit Union 1, the robber took approximately \$12,500 in United States currency from Credit Union 1 during the robbery. According to a certificate provided by Credit Union 1, Credit Union 1 was insured by the National Credit Union Association at the time of the robbery.

B. Identification of LEE, JR. as the Robber

1. May 19, 2024 Arrest of LEE, JR.

18. According to records from the Broadview, Illinois Police Department (“BPD”), on or about May 19, 2024, LEE, JR. was arrested in Broadview, Illinois.

19. According to the BPD incident report, on or about May 19, 2024, at approximately 11:22 a.m., BPD officers were dispatched to the Travel Inn Motel at 1150 West Roosevelt Road, Broadview, Illinois, to respond to a domestic disturbance at Room 202. According to the incident report and body worn camera footage from responding officers, when officers arrived at the motel, they observed a black male, later identified as LEE, JR., walking away from the officers in the parking lot.

20. According to the BPD incident report and body worn camera footage from responding officers, officers then established contact with a woman (“Individual D”) in Room 202, who told them that she had arranged to buy cannabis from a man at the motel. According to Individual D, when the man arrived at the motel room, he displayed a firearm and demanded sex from her. Individual D stated she was able to gain control of the firearm and told the man to leave the room.

21. According to the BPD incident report and body worn camera footage from responding officers, Individual D identified the man walking away in the parking lot as the offender. After a foot pursuit, officers detained the male and through records checks, identified him as MAURICE D. LEE, JR.

22. Below is photograph of LEE, JR. taken after his arrest on May 19, 2024:



23. As seen in the arrest photograph, LEE, JR.'s complexion and build appear to match those of the robber captured in the surveillance video from the May 17 Credit Union 1 robbery.

24. According to the BPD incident report and body worn camera footage from responding officers, BPD officers recovered one black 9mm Smith & Wesson pistol bearing serial number SBC9199 from the motel room. Below is a still image from the body worn camera of a BPD responding officer showing the firearm recovered from Room 202, which is consistent with the firearm used in the May 17 Credit Union 1 robbery:



25. Additionally, according to body-worn camera footage from BPD officers, officers observed a blue backpack with accents appearing pink in color inside Room 202. This backpack is similar in appearance to the backpack carried by the Credit Union 1 robber. Below is a still image from the body worn camera of a BPD responding officer showing the backpack inside Room 202:



26. According to court records, LEE, JR. was indicted for gun offenses, including, among other offenses, aggravated unlawful use of a weapon in the Circuit

Court of Cook County, Illinois and was thereafter detained in the Cook County, Illinois jail.

2. Recovery and Search of the Highlander

27. According to law enforcement records, on or about July 10, 2024, CPD located the stolen Highlander used in the May 17, 2024 Credit Union 1 robbery near the 400 block of West 62nd Street in Chicago. The Highlander was unoccupied and parked in a grassy area. On the same date, the FBI seized the Highlander and towed it to a secure auto bay at the FBI Chicago Field office.

28. According to FBI reports, on or about July 12, 2024, members of the FBI Chicago Evidence Recovery Team (“ERT”) conducted a consent search on the Highlander.²

29. According to FBI reports, during the search of the Highlander, members of the ERT recovered: (1) latent fingerprints; (2) various DNA swabs; and (3) several physical items. All recovered evidence was submitted to the FBI Laboratory for analysis.

30. According to FBI reports, on or about July 15, 2024 and subsequent to the consent search, law enforcement returned the Highlander to Individual A. At this time, Individual A provided law enforcement with DNA and fingerprint samples for comparison purposes.

² According to FBI records, on or about May 17, 2024, after the Highlander was reported carjacked, Individual A signed a consent to search form authorizing law enforcement officials to search the Highlander if and when the vehicle was recovered.

31. According to FBI reports, none of the latent fingerprints were suitable for comparison. Male DNA was detected on numerous swabs taken from inside the vehicle, including swabs taken from the interior door handle from the front driver's side.³ A DNA profile originating from three individuals, one of whom is Individual A, was obtained from the swabs taken from the front driver's side interior door handle. The DNA results from these swabs are 31 billion times more likely if Individual A, LEE, JR., and an unknown, unrelated person are contributors than if Individual A and two unknown, unrelated people are contributors.

3. LEE, JR.'s Cook County Conviction

32. According to court records, on or about June 12, 2025, LEE, JR. pleaded guilty to one count of aggravated unlawful use of a weapon in violation of Title 720, Illinois Consolidated Statutes, Section 5/24-1.6(a)(1), based upon his possession of the

³ According to FBI reports, DNA was also detected on swabs taken from various other parts of the Highlander and items recovered within the Highlander.

The DNA results from swabs taken from the outside surface of black elastic bands and the outside surface of black fabric on one half of the Highlander's steering wheel cover provided strong support for LEE, JR.'s inclusion as a contributor. The DNA results from the swabs taken from the front driver side seat belt provided moderate support for LEE, JR.'s inclusion as a contributor. The DNA results from swabs taken from a bottle located inside the Highlander provided limited support for LEE, JR.'s inclusion as a contributor.

DNA was obtained from swabs taken from three additional bottles located inside the Highlander; LEE, JR. was excluded as a potential contributor to all three bottles. DNA was also obtained from swabs taken from two inhalers located inside the Highlander; LEE, JR. was excluded as a potential contributor to both items. The DNA results from the swabs taken from the gear shift, the rear passenger side interior door handle, and the rear driver side interior door handle provided limited support for LEE, JR.'s exclusion as a contributor.

No DNA was obtained from swabs taken from the front passenger side interior door handle, the mouth area of a can from the rear passenger side floor, and the textured areas and edges from the handle of a tool from the front passenger side floor; therefore, no comparisons could be made for those items.

Smith & Wesson pistol on or about May 19, 2024. LEE, JR. was sentenced to two years' imprisonment with credit for time served.

III. CONCLUSION

33. Based on the information above, I respectfully submit that there is probable cause to believe that on or about May 17, 2024, MAURICE D. LEE, JR. by intimidation, did take from the person or presence of a bank employee approximately \$12,500 in United States currency belonging to, and in the care, custody, control, management and possession of Credit Union 1, 828 Wolcott Avenue, Chicago, Illinois, the deposits of which were then insured by the National Credit Union Administration, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.



MATTHEW STEVENSON
Special Agent
Federal Bureau of Investigation

SWORN TO AND AFFIRMED BY telephone on June 13, 2025.



Honorable GABRIEL A. FUENTES
United States Magistrate Judge